

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Lynchburg Division

JANE DOE,)	
)	
Plaintiff,)	
)	
v.)	Case No. 6:21-cv-00059-NKM
)	
LIBERTY UNIVERSITY, INC., <i>et al.</i>)	
)	
)	
Defendants.)	

LIBERTY UNIVERSITY, INC.'S MOTION TO DISMISS

Defendant Liberty University, Inc. ("Liberty" or the "University"), by counsel, and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, moves to dismiss Counts I, III and IV of Plaintiff's Complaint (ECF No. 1), for failure to state a claim upon which relief can be granted. The reasons and authority for this Motion are set forth with particularity in the accompanying Memorandum in Support.

WHEREFORE, Liberty respectfully requests that the Court grant its Motion to Dismiss, and dismiss Counts I, III, and IV of Plaintiff's Complaint with prejudice and award them any such further relief the Court deems appropriate.

LIBERTY UNIVERSITY, INC.,

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CERTIFICATE OF SERVICE

I certify that on January 14, 2022, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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